

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101**

IN THE MATTER OF:

Ornamental Brass Foundry
1600 South Marsh

Kansas City, Missouri 64126

Non-notifier
RCRA file ID # MOR000043141

Respondent.

Proceeding under Section 3008 (a) and (g) of the Resource Conservation and Recovery Act as amended, 42 U.S.C. § 6928(a) and (g).

**COMPLAINT AND
CONSENT AGREEMENT/
FINAL ORDER**

Docket No. RCRA-07-2003-0203

COMPLAINT AND
CONSENT AGREEMENT/FINAL ORDER

This administrative action is being conducted pursuant to Section 3008(a) and (g) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 ("RCRA") and the Hazardous and Solid Waste Amendments of 1984 ("HSWA"), 42 U.S.C. § 6928(a) and (g), and in accordance with the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, Title 40 C.F.R. Part 22 ("Consolidated Rules of Practice").

The Complainant is the Director of the Air, RCRA, and Toxics Division of the United States Environmental Protection Agency ("EPA") Region 7, who has been duly delegated the authority to bring this action. The Respondent is Ornamental Brass Foundry (hereinafter "Ornamental Brass" or "Respondent"), an unincorporated, privately-owned business located at 1600 South Marsh in Kansas City, Missouri. The authority to execute the Complaint portion of this Complaint and Consent Agreement/Final Order is provided to the Regional Administrators by EPA Delegation No. 8-9-A, dated March 20, 1985. The Regional Administrator has delegated this authority to the Director of the Air, RCRA and Toxics Division of EPA Region 7 by EPA Delegation No. R7-8-009-A, dated January 1, 1995. The authority to sign Consent Agreements is delegated to Regional Counsel with the concurrence of the Director of the Air, RCRA and Toxics Division of EPA Region 7 by EPA Delegation No. R7-9-009-A, January 1, 1995.

Complainant and Respondent have agreed to a settlement of the following Factual Allegations, and thus this action is simultaneously commenced and concluded pursuant to Rules 22.13(b), 22.18(b)(2) and 22.18(b)(3) of the Consolidated Rules of Practice, 40 C.F.R. §§ 22.13(b), 22.18(b)(2) and 22.18(b)(3). This Complaint and Consent Agreement/Final Order is a complete and final settlement of all civil and administrative claims and causes of action for the violations set forth in this Complaint and Consent Agreement/Final Order.

The State of Missouri has been granted authorization to administer and enforce a hazardous waste program pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, and the State of Missouri has adopted by reference the federal regulations cited herein at the Code of State Regulations ("CSR") Title 10, Division 25. Section 3008 of RCRA, 42 U.S.C. § 6928, authorizes the EPA to enforce the provisions of the authorized State program and the regulations

promulgated thereunder. When the EPA determines that any person has violated or is in violation of any RCRA requirement, EPA may issue an order assessing a civil penalty for any past or current violation and/or require immediate compliance or compliance within a specified time period pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928. In the case of a violation of any RCRA requirement, where such violation occurs in a state which is authorized to implement a hazardous waste program pursuant to Section 3006 of RCRA, EPA shall give notice to the state in which such violation has occurred or is occurring prior to issuing an order. The State of Missouri has been notified of this action in accordance with Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), authorizes a civil penalty of not more than \$25,000 per day for violations of Subchapter III of RCRA (Hazardous Waste Management). This figure has been adjusted upward for inflation pursuant to the Civil Monetary Penalties Inflation Adjustment Rule, 40 C.F.R. Part 19, so that penalties of up to \$27,500 per day are now authorized for violations of Subchapter III of RCRA that occur after January 30, 1997. Based upon the facts alleged in this Complaint and Consent Agreement/Final Order and upon those factors which the Complainant must consider pursuant to Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), as discussed in the RCRA Civil Penalty Policy issued by EPA on October 26, 1990, the Complainant and Respondent agree to the payment of a civil penalty pursuant to Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), for the violations of RCRA alleged in this Complaint and Consent Agreement/Final Order.

FACTUAL ALLEGATIONS

Jurisdiction, Statutory and Regulatory Requirements

1. This is an administrative action for the assessment of civil penalties instituted pursuant to Section 3008(a) and (g) of RCRA, 42 U.S.C. § 6928(a) and (g).

2. This Complaint and Consent Agreement/Final Order serves as notice that EPA has reason to believe that Respondent violated the statutory and regulatory requirements found at:

- a. 40 C.F.R. § 262.11, as incorporated by reference at 10 C.S.R. 25-5.262(1); and
- b. Section 3010(a) of RCRA, and RSMo § 260.380.1(1).

3. Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), provides that if EPA determines that any person has violated or is in violation of any requirement of Subchapter III, EPA may issue an order assessing a civil penalty for any past or current violation, require compliance, or both.

4. Section 3005 of RCRA, 42 U.S.C. § 6925, and RSMo § 260.390(1), require each person owning or operating a facility for the treatment, storage or disposal of hazardous waste identified or listed under Subchapter C of RCRA to have a permit issued pursuant to Section 3005 of RCRA.

5. Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), authorizes a civil penalty of not more than \$25,000 per day for violations of Subchapter III of RCRA (Hazardous Waste Management). This figure has been adjusted upward for inflation pursuant to the Civil Monetary Penalties Inflation Adjustment Rule, 40 C.F.R. Part 19, so that penalties of up to \$27,500 per day are now authorized for violations of Subchapter III of RCRA that occur after January 30, 1997. Pursuant to Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), EPA must consider various factors in assessing a penalty, including the seriousness of the violations and any good faith efforts of

Respondent to comply with the applicable requirements.

6. Respondent is a privately-owned, unincorporated business operating at 1600 South Marsh in Kansas City, Missouri, 64126, and is a "person" as defined in Section 1004(15) of RCRA, 42 U.S.C. § 6903(15).

7. Respondent manufactures bronze and aluminum castings for ornamental uses, such as weather vanes, belt buckles, plaques and trophies.

8. In the course of its business, Ornamental Brass generates several waste streams. These include waste skimmings from the melting of bronze and aluminum, waste core butts from metal casting operations, and waste mold sand, also from metal casting operations.

9. The Ornamental Brass facility was inspected by an EPA representative on July 25, 2000.

10. As of the date of the inspection, Ornamental Brass had never filed a notification of hazardous waste activity as required by Section 3010 of RCRA, 42 U.S.C. § 6910, and 40 C.F.R. § 262.12(a), as incorporated by reference at 10 C.S.R. 25-5.262(1); however, for administrative and tracking purposes, the Missouri Department of Natural Resources ("MDNR") assigned Ornamental Brass the RCRA file number MOR000043141.

11. Ornamental Brass has not obtained a permit or interim status enabling it to operate a hazardous waste treatment, storage or disposal facility pursuant to Section 3005 of RCRA, 42 U.S.C. § 6925, or 10 CSR 25-5.262.

12. Based on estimates made by EPA's inspector, at the time of the inspection, Ornamental Brass was generating approximately 300 pounds of waste core butts and mold sand per month. Tests conducted on the waste core butts and mold sand showed that these wastes

exhibit the hazardous characteristic of toxicity for lead. These wastes are therefore "hazardous wastes" within the meaning of Section 260.360(11) of the Missouri Hazardous Waste Management Law, RSMo § 260.360(11) and 10 C.S.R. 25-4.261, which incorporates by reference the methods for classification of hazardous waste found at 40 C.F.R. Part 261. Based on information available to EPA as of the effective date of this Complaint and Consent Agreement/Final Order, Respondent is currently generating approximately 150 pounds of hazardous waste per month.

13. Pursuant to 10 CSR 25-5.262(2)(C), persons generating more than 100 kilograms (approximately 220 pounds) but less than 1,000 kilograms (approximately 2,200 pounds) of hazardous waste per month are classified as small quantity generators and must comply with the applicable requirements of 10 CSR 25-5.262, incorporating by reference 40 C.F.R. Part 262.

14. Once a waste is classified a hazardous waste, it is assigned a waste code pursuant to the regulations discussed in paragraph 12. The wastes listed in paragraph 12 are characteristic hazardous wastes bearing the waste code D008.

VIOLATIONS

Failure to perform a hazardous waste determination

15. Complainant hereby incorporates the allegations contained in paragraphs 1 through 14 above, as if fully set forth herein.

16. Pursuant to 40 C.F.R. § 262.11, as incorporated by reference at 10 C.S.R. 25-5.262(1), a generator of solid waste, as defined in 40 C.F.R. § 260.10, is required to determine if the solid waste is a hazardous waste.

17. At the time of the July 25, 2000 inspection, Respondent's representative told the EPA inspector that the waste core butts and mold sand, which were being collected in a wheelbarrow and disposed of on the ground behind the facility, were not hazardous. In a letter sent to EPA dated February 2, 2001, Respondent's representative stated that no hazardous waste determination had been performed on the waste core butts and mold sand.

18. Testing performed on samples collected during the July 25, 2000 inspection showed that the waste core butts and mold sand exhibited the hazardous characteristic of toxicity for lead. These materials are therefore RCRA hazardous wastes bearing the RCRA waste code D008.

19. Respondent failed to adequately perform a hazardous waste determination on its waste core butts and mold sand. Respondent's failure to perform this determination is a violation of 10 C.S.R. 25-5.262(1), incorporating by reference 40 C.F.R. § 262.11.

Failure to file a notification of hazardous waste activity

20. Pursuant to Section 3010(a) of RCRA, as well as Section 260.380.1(1) RSMo, generators of hazardous waste are required to file a notification of hazardous waste activity.

21. As of the date of the inspection, Respondent had never filed a notification of hazardous waste activity, or obtained an EPA identification number, although Respondent was generating, storing and disposing of hazardous waste at Respondent's facility.

22. Respondent's failure to file a notification of hazardous waste activity is a violation of Section 3010(a) of RCRA and Section 260.380.1(1) RSMo. Respondent's storage and disposal of waste at the facility without obtaining an EPA identification number is a violation of 10 C.S.R. 25-5.262(1), incorporating by reference 40 C.F.R. § 262.12(a).

**OPERATING AS A TREATMENT, STORAGE OR DISPOSAL FACILITY
WITHOUT A RCRA PERMIT OR RCRA INTERIM STATUS**

23. Complainant hereby incorporates the allegations contained in paragraphs 1 through 22 above, as if fully set forth herein.

24. Pursuant to Section 3005 of RCRA and RSMo § 260.390(1), it is a violation of RCRA to operate a hazardous waste treatment, storage or disposal facility ("TSD") without a permit or without having obtained interim status to operate the facility.

25. At the time of the July 25, 2000 inspection, waste core butts and mold sand had been placed on the ground outside the back door of Respondent's facility. The Respondent's representative stated that he had been scattering or dumping waste core butts and mold sand on the ground at the facility for approximately two years.

26. Analysis of a sample obtained by EPA's inspector of the waste core butts and mold sand from the outdoor disposal area showed that these materials exhibited the hazardous characteristic of toxicity for lead, and therefore are classifiable as hazardous wastes bearing the waste code D008.

27. Pursuant to 40 C.F.R. § 260.10, incorporated by reference at 10 CSR 25-3.260(1), "disposal" means "the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters."

28. Respondent's placement of waste core butts and mold sand (hazardous waste code D008) on the ground outside the facility constitutes disposal of hazardous waste within the

meaning of 40 C.F.R. § 260.10, incorporated by reference at 10 CSR 25-3.260(1).

29. Respondent has never obtained a permit or interim status allowing Respondent to operate a hazardous waste disposal facility.

30. Respondent's dumping of hazardous waste on the ground behind its facility therefore constitutes operation of a hazardous waste facility without a permit, in violation of Section 3005 of RCRA, 42 U.S.C. § 6925, and RSMo § 260.390(1).

CONSENT AGREEMENT

31. Respondent and EPA agree to the terms of this Complaint and Consent Agreement/Final Order and Respondent agrees to comply with the terms of the Final Order portion of this Complaint and Consent Agreement/Final Order.

32. Respondent admits the jurisdictional allegations of this Complaint and Consent Agreement/Final Order and agrees not to contest EPA's jurisdiction in this proceeding or any subsequent proceeding to enforce the terms of the Final Order portion of this Complaint and Consent Agreement/Final Order set forth below.

33. Respondent neither admits or denies the factual allegations and legal conclusions set forth in this Complaint and Consent Agreement/Final Order; however, Respondent agrees not to contest the factual allegations and legal conclusions in any proceeding to enforce the terms of the Final Order portion of this Complaint and Consent Agreement/Final Order.

34. Respondent waives its right to a judicial or administrative hearing on any issue of fact or law set forth above, and its right to appeal the proposed Final Order portion of the Complaint and Consent Agreement/Final Order.

35. Respondent and Complainant agree to conciliate the matters set forth in this Complaint and Consent Agreement/Final Order without the necessity of a formal hearing and to bear their respective costs and attorney's fees.

36. This Complaint and Consent Agreement/Final Order addresses all civil administrative claims for the RCRA violations identified above. Complainant reserves the right to take any enforcement action with respect to any other violations of RCRA or any other applicable law.

37. Nothing contained in the Final Order portion of this Complaint and Consent Agreement/Final Order shall alter or otherwise affect Respondent's obligation to comply with all applicable federal, state and local environmental statutes and regulations and applicable permits.

38. The undersigned representative of Respondent certifies that he or she is fully authorized to enter the terms and conditions of this Complaint and Consent Agreement/Final Order and to execute and legally bind Respondent to it.

39. The parties agree that the Respondent shall pay a penalty of ZERO DOLLARS (\$0) because Respondent has demonstrated an inability to pay any penalty for the violations cited in the Complaint portion of this Complaint and Consent Agreement/Final Order.

40. Respondent understands that failure to complete the Compliance Actions described in the Final Order within the designated timeframes may, among other things, subject Respondent to civil penalties up to \$27,500 per day of non-compliance.

41. This Complaint and Consent Agreement/Final Order shall be effective upon entry of the Final Order by the Regional Judicial Officer for EPA Region VII. Unless otherwise stated, all time periods stated herein shall be calculated in calendar days from such date.

42. This Consent Agreement and the Final Order shall remain in full force and effect until Complainant provides Respondent with written notice, in accordance with paragraph 15 of the Final Order, that all requirements hereunder have been satisfied.

FINAL ORDER

Pursuant to the authority of Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), and according to the terms of this Complaint and Consent Agreement/Final Order, IT IS HEREBY ORDERED THAT:

A. Compliance Actions

1. Within sixty (60) days of the effective date of this Order, Respondent shall develop and submit a Waste Management Plan for the areas in the facility where hazardous wastes are used, stored or maintained. This plan shall contain written hazardous waste determinations on each solid waste stream generated by Respondent and shall set forth criteria for determining when a material becomes a hazardous waste, how such determination is made in accordance with 10 C.S.R. 25-5.262 (which incorporates by reference 40 C.F.R. § 262.11) and how the hazardous waste shall be properly managed while on-site in accordance with 10 C.S.R. 25-5.262 (which incorporates by reference 40 C.F.R. § 262.34). A copy of the plan shall be provided to EPA's representative identified in paragraph 8 below ("EPA's representative") for review and approval in accordance with the procedures outlined in paragraph 8.

2. Within twenty (20) days of the effective date of this Order, Respondent shall file a notification of hazardous waste activity pursuant to Section 3010 of RCRA, 42 U.S.C. § 6930, with the Missouri Department of Natural Resources. Respondent shall also provide a copy to EPA's representative identified in paragraph 8 below.

3. Within sixty (60) days of the effective date of this Order, Respondent shall identify all hazardous waste shipped off-site since the July 25, 2000, inspection, including manifests for each such shipment. Also within sixty (60) days of the effective date of this Order, Respondent shall develop a hazardous waste inventory of all wastes currently being stored or which have been disposed of on-site. Copies of these documents shall be provided to EPA's representative identified in paragraph 8 below.

4. Within thirty (30) days of the effective date of this Order, Respondent shall establish a designated hazardous waste storage area at the facility and shall provide EPA's representative with a map of the facility showing where the storage area is located.

5. Within ninety (90) days of the effective date of this Order, Respondent shall arrange for the proper off-site shipment and disposal of all hazardous wastes identified in the above-referenced hazardous waste inventory, as well as for all hazardous wastes identified pursuant to the Waste Management Plan. Copies of any manifests, contracts, or other documents demonstrating that all wastes have been shipped off-site shall be provided to EPA's representative identified in paragraph 8 below.

6. Within ninety (90) days of the effective date of this Order, Respondent shall develop a sampling plan to be performed by a qualified party to determine the nature and extent of contamination at the facility. The sampling plan shall include a schedule for implementation and shall be submitted to EPA's representative for review and approval in accordance with the procedures set forth in paragraph 8 below. Once approved by EPA, Respondent shall implement the sampling plan in accordance with the schedules contained therein.

7. Upon completion of sampling pursuant to the sampling plan, EPA will determine if any clean-up of contamination at the facility is warranted. If so notified by EPA, Respondent will develop a cleanup plan within ninety (90) days of Respondent's receipt of such notice which shall be submitted to EPA's representative for review and approval in accordance with paragraph 8 below. Any such cleanup plan shall comply with 40 C.F.R. Part 264, Subpart G, and will include schedules for completion of necessary work. Upon EPA approval of the cleanup plan, Respondent shall implement the plan in accordance with the schedules set forth therein.

8. All plans, reports, or other documents to be submitted pursuant to this Final Order shall include schedules for implementation, and shall be submitted to EPA's representative for review and approval:

Marc Matthews
RESP/ARTD
U.S. EPA Region VII
901 N. 5th Street
Kansas City, Kansas 66101
(913) 551-7517

EPA's representative may approve the submission, disapprove the submission and require modifications, or unilaterally modify any plans, schedules or other documents to require additional activities. Upon approval by EPA, Respondent shall take any actions required by any such plans in accordance with the schedules contained therein.

B. Parties Bound

9. This Final Order portion of this Complaint and Consent Agreement/Final Order shall apply to and be binding upon Complainant and Respondent and Respondent's agents, successors and/or assigns. Respondent shall ensure that all contractors, employees, consultants, firms or

other persons or entities acting for Respondent with respect to matters included herein comply with the terms of this Complaint and Consent Agreement/Final Order.

C. Reservation of Rights

10. Notwithstanding any other provision of this Complaint and Consent Agreement/Final Order, EPA reserves the right to enforce the terms of the Final Order portion of this Complaint and Consent Agreement/Final Order by initiating a judicial or administrative action under Section 3008 of RCRA, 42 U.S.C. § 6928, and to seek penalties against Respondent in an amount not to exceed twenty-seven thousand five hundred dollars (\$27,500) per day per violation pursuant to Section 3008(c) of RCRA, for each day of non-compliance with the terms of the Final Order, or to seek any other remedy allowed by law.

11. Complainant reserves the right to take enforcement action against Respondent for any future violations of RCRA and its implementing regulations and to enforce the terms and conditions of this Complaint and Consent Agreement/Final Order.

12. Except as expressly provided herein, nothing in this Complaint and Consent Agreement/Final Order shall constitute or be construed as a release from any claim (civil or criminal), cause of action, or demand in law or equity by or against any person, firm, partnership, entity or corporation for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release or disposal of any hazardous constituents, hazardous substances, hazardous wastes, pollutants or contaminants found at, taken to, or taken from Respondent's facility.

13. Notwithstanding any other provisions of the Complaint and Consent Agreement/Final Order, an enforcement action may be brought pursuant to Section 7003 of

RCRA, 42 U.S.C. § 6973, or other statutory authority, should EPA find that the future handling, storage, treatment, transportation, or disposal of solid waste or hazardous waste at Respondent's facility may present an imminent and substantial endangerment to human health and the environment.

14. The headings in this Complaint and Consent Agreement/Final Order are for convenience of reference only and shall not affect interpretation of this Complaint and Consent Agreement/Final Order.

15. The provisions of this Complaint and Consent Agreement/Final Order shall be deemed satisfied upon a written determination by Complainant that Respondent has fully implemented the actions required in the Final Order.

COMPLAINANT:
U.S. ENVIRONMENTAL PROTECTION AGENCY

6/27/03
Date

William A. Spratlin *for WWS*
Director
Air, RCRA, and Toxics Division
U.S. Environmental Protection Agency
Region VII

6/26/03
Date

Belinda L. Holmes
Belinda L. Holmes
Senior Assistant Regional Counsel
U.S. Environmental Protection Agency
Region VII

Sent By: HILLCREST BANK ;

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Jun-25-03 9:59AM;

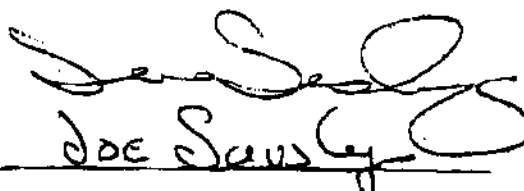
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In the matter of Ornamental Brass Foundry
Page 17

RESPONDENT:
ORNAMENTAL BRASS FOUNDRY

JUNE 25, 003
Date

Name


Joe Sausky

Title

OWNER

Address

1600 S. Marsh

KCMO 64126

IT IS SO ORDERED. This Final Order shall become effective immediately.

A handwritten signature in cursive script, appearing to read "Robert Patrick", written over a horizontal line.

Robert Patrick
Regional Judicial Officer

Date June 27, 2003

IN THE MATTER OF, Ornamental Brass Foundry, Respondent
Docket No. RCRA-07-2003-0203

CERTIFICATE OF SERVICE

I certify that the foregoing Complaint and Consent Agreement/Final Order was sent this day in the following manner to the addressees:

Copy hand delivered to
Attorney for Complainant:

Belinda L. Holmes
Senior Assistant Regional Counsel
Region VII
United States Environmental Protection Agency
901 N. 5th Street
Kansas City, Kansas 66101

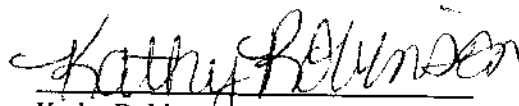
Copy by U.S. Certified Mail,
Return Receipt Requested, to:

Joe Sousley, Owner
Ornamental Brass Foundry
1600 S. Marsh
Kansas City, Missouri 64126

and

Robert Kroeker, Esq.
Martin Leigh Laws & Fritzlen, PC
400 Pecks Plaza
1044 Main Street
Kansas City, Missouri 64105-2135

Dated: 6/27/03


Kathy Robinson
Regional Hearing Clerk

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VII

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IN THE MATTER OF)

Ornamental Brass Foundry)

Respondent)
_____)

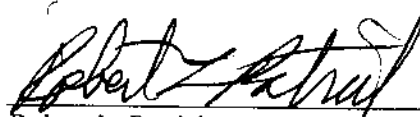
ENVIRONMENTAL PROTECTION
AGENCY-REGION VII
REGIONAL HEARING CLERK

Docket No. RCRA-07-2003-0203

ORDER AUTHORIZING FACSIMILE FILING

Pursuant to 40 C.F.R. §22.5(a)(1), facsimile filing of the telefaxed signature page
(page 17) of the Complaint and Consent Agreement/Final Order in this proceeding is hereby authorized.

Dated: June 27, 2003



Robert L. Patrick
Regional Judicial Officer

IN THE MATTER OF, Ornamental Brass Foundry, Respondent
Docket No. RCRA-07-2003-0203

CERTIFICATE OF SERVICE

I certify that the foregoing Order was sent this day in the following manner to the addressees:

Copy hand delivered to
Attorney for Complainant:

Belinda L. Holmes
Senior Assistant Regional Counsel
Region VII
United States Environmental Protection Agency
901 N. 5th Street
Kansas City, Kansas 66101

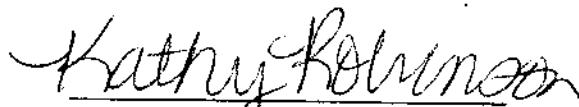
Copy by U.S. Certified Mail,
Return Receipt Requested, to:

Joe Sousley, Owner
Ornamental Brass Foundry
1600 S. Marsh
Kansas City, Missouri 64126

and

Robert Kroeker, Esq.
Martin Leigh Laws & Fritzlen, PC
400 Pecks Plaza
1044 Main Street
Kansas City, Missouri 64105-2135

Dated: 10/27/03



Kathy Robinson
Regional Hearing Clerk